

***CUSTOMER PROPRIETARY NETWORK
INFORMATION***

CPNI

***OPERATING PROCEDURE
GUIDELINES***

COLUMBUS TELEPHONE CO.

EFFECTIVE 12-08-07

Summary Overview of CPNI Operating Procedures of Columbus Telephone Co.

- CPNI effective operations date: December 8, 2007
- CPNI is Call Detail Records (CDR's), Account information relating to customer service relationship
- Designated Compliance Officer: General Manager
- Backup Compliance Officer: Corporate Secretary
- Training Requirements: Each March, the General Manager and/or the Corporate Secretary will hold a training session on CPNI. All persons receiving training will certify attendance at said training.
(See Attached)
- Columbus Telephone Co. will not utilize the "One-Time", password approach to "authenticate a customer. We will ask the for bill detail (services they subscribe to, amount of last months bill, other name's on the account etc.) Then we will call the customer back at the telephone number of record. We will also ask the customer a question with the answer entered into the customer account record for future use.
- Columbus Telephone Co. will notify customers immediately of changes to their accounts, specifically: a password, a backup or forgotten password, an online account, or address of record. This notification will be made in the form of written correspondence, mailed to the person(s) of record on the account, at the account billing address.

- Disciplinary Procedure: In the event of a breach of CPNI rules by an employee of Columbus Telephone Co., the following actions will occur;
 - First offense: A verbal reprimand will be given.
 - Second offense: A written reprimand will be given with a copy to the personnel file.
 - Third offense Dismissal.
- We will only provide CPNI to the person of record on the account.

Suggested Procedure: For In-Office Customer Visit and Customer Initiated Calls

In-office Customer Visit

- Step 1.** Authenticate the customer with a valid photo ID and confirm that the person is listed as a contact on the account.
- Step 2** Check status of customer's CPNI approval.
- Step 3:** Respond to the customer's request following the rules for whether or not CPNI approval is needed.

NOTE:

If the customer is just dropping off payment, no authentication is needed unless the customer needs to know the amount of the bill.

If the person paying the bill is not listed on the account, the company cannot disclose the amount due. The person would need to tell the company the amount that the customer wanted to pay on the account.

Customer- Initiated Call

- Step 1:** Authenticate the customer (password or authentication question, whichever your company has decided to use) and confirm that the customer is listed as a contact on the account.
- Step 2:** Check status of the customer's CPNI approval.
- Step 3:** Respond to the customer's request following the rules for whether or not CPNI approval is needed.

The company has made the decision not to issue passwords. A customer calls the office, and an answer to the authentication question has not been previously established. How should this be handled?

Apologize to the customer for the inconvenience. Explain to the customer, that to protect the customer's privacy, the FCC now requires the company to authenticate the customer before discussing any information in the account.

Since this does not involve authentication for a password, the CSR could to one of the following:

- Call the customer at the telephone number of record.
- Ask the customer to provide some information contained in the account, e.g., services the customer subscribes to, amount of last bill, other names listed on the account, etc.

Once the CSR has authenticated the customer, explain that whenever the customer calls the office in the future, you will ask them for the answer to a specific question that you are now going to ask. You will then need to ask the question and record the answer in the customer's account records.

EMPLOYEE CPNI TRAINING CERTIFICATION

On an annual basis an officer of our company must certify to the Federal Communications Commission (FCC) it has established procedures adequate to ensure compliance with the FCC's Customer Proprietary Network Information (CPNI) rules.

One of the things the officer is certifying to its employees, especially those having access to CPNI, have been trained on the CPNI rules. The training includes, but is not limited to, when employees are and are not authorized to use CPNI, and the authentication methods the company is using for both call detail and non-call detail information.

By signing below, I acknowledge:

- I have received the required training on the CPNI rules.
- I understand the company's procedures for protecting CPNI.
- I understand the company's disciplinary process if I use CPNI inappropriately.
- I understand if I have any questions at any time regarding the rules, I should immediately contact the General Manager or Corporate Secretary.

Employee Printed Name: _____

Employee Signature: _____

Date: _____

RELEASE AUTHORIZATION AND INDEMNITY AGREEMENT

The undersigned jointly and severally agree to indemnify and save harmless Columbus Telephone Co., (Indemnatee) from any claim, action, liability or suit, arising from the following:

The release of Customer Proprietary Information (CPNI) on telephone number _____ to _____
(Name)

(Address)

(Telephone number)

In the event of any asserted claim, the Indemnatee shall provide the undersigned timely notice of same, and thereafter the undersigned shall at its own expense defend and protect Indemnatee against said claim.

In the further event the undersigned shall fail to so defend, then in such instance the Indemnatee shall have full rights to defend, pay or settle said claim with full rights of recourse against the undersigned for all fees, costs, expenses and payments made or agreed to be paid to discharge said claim.

This agreement shall be binding upon and inure to the benefit of the parties, their successors, assigns and personal representatives.

Signed under seal this _____ day of _____, 20____.

Witness

Customer of Record Signature

Printed Name

Address

City